

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
GALVESTON DIVISION**

<b>IN RE:</b>	§	<b>CASE NO. 17-80115-G5-13</b>
<b>Ryan Christopher Brady</b>	§	
<b>Christine Nicole Brady</b>	§	
	§	
<b>DEBTOR(S)</b>	§	<b>CHAPTER 13</b>

**DEBTOR'S RESPONSE TO TRUSTEE'S MOTION TO DISMISS  
AND REQUEST FOR HEARING**

Ryan Christopher Brady and Christine Nicole Brady oppose the Trustee's Motion to Dismiss filed on or about June 18, 2020.

Debtors intend to file a Modified Plan under the C.A.R.E.S act before the date of this hearing.

Debtors request a hearing.

Debtors request that the Trustee's Motion to Dismiss be DENIED.

Respectfully submitted,  
KEELING LAW FIRM

/s/Kenneth A. Keeling  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served on all parties electronically or by U.S. First Class Mail on July 9, 2020.

United States Trustee  
515 Rusk, Suite 3516  
Houston, TX 77002

William E Heitkamp  
9821 Katy Freeway  
Suite 590  
Houston, TX 77024

Ryan Christopher Brady  
Christine Nicole Brady  
2304 Jackson Lane  
League City, TX 77573

/s/Kenneth A. Keeling  
KENNETH A. KEELING